

Exhibit II

Avid Telecom's Robocall Mitigation Plan

General Background

Avid was established in 1991 as a wholesale telecom provider. We have a 214 license (20090715-00332) for doing international business, a 499 filer ID (828064), and are incorporated in the State of Arizona (L-0967859-1). We have an intolerance for abusive, fraudulent, or non-complaint traffic on our network and have worked diligently and proactively to remove customers we find to be non-compliant. Therefore, to further that goal and specifically in compliance with FCC regulations, we have implemented the below described Robocall Mitigation Plan in order to effectively contribute to the industry efforts of mitigate unlawful robocalls.

Monitoring and Basic Telephone Number Authorization & Blocking

We have many automatic processes in place that block calls prior to them hitting the routing engine in our switch. Examples are:

- Calls with invalid caller ID are blocked
- Calls with matching originating and terminating numbers are blocked
- “Neighborhood Spoofing” calls are blocked (calls with the same “NPA/NXX”)
- Calls from blacklisted media IP’s are blocked. To explain, these are media IP’s that are known to have been used for scams, such as government and corporate impersonation.
- Calls are blocked from numbers that are known to be used for spoofing. This is specifically helpful in blocking government and corporate impersonation scams.
- Due to assumptions that can be made with regard to fraudulent campaigns, as a general network setting, we automatically block ANI’s on a real time basis that produce less than 5% ASR, 5 second or less ACD, and any number with greater than 60% short duration calls (calls of 6 seconds or less).
- Calls from wireless ANIs are blocked unless the customer is a wireless carrier.
- Calls that have been labeled as “almost certainly” spam by YouMail are blocked.
- Calls that are labeled as “scam” by YouMail are blocked.

As to the remainder of the traffic, we have a relationship with our customers that allows us to understand the type of traffic being sent on a daily basis. Any significant change in the traffic patterns and/or changes in customer IP addresses can alert us to potential issues with regard to a customer’s traffic will lead us to a more specific review. If the technical review finds that patterns are consistent with illegal robocalling, appropriate action is taken with regard to the customer. Depending on the specific stats and suspected issue, the customer is generally given 24 – 48 hours to investigate. Any inadequate response leads to suspension of the route.

Subscriber Vetting (Know Your Customer)

As for new customers, Avid requires the following:

1. Completion of a Customer Information Form – questions include, among other things, verification of compliance with tracebacks, a description of their vetting process for new

customers and actions taken when fraudulent customers are found. All requested information in the document must be completed in order to move forward.

2. Customer Profile Form – questions include, among other things,
 - a. 499 Filer ID
 - b. FCC registration no
 - c. trade references
 - d. shaken/stir compliance plan
 - e. bank references
 - f. state of incorporation
 - g. federal tax ID.

All information requested in the document is required to move forward.

3. Description of the nature of business
4. Company responsible parties
5. Signed Master Service Agreement (MSA)
6. Signed FUSF form for the current year
7. Verification that customer has filed a robocall mitigation plan

Applications from Non-US carriers attempting to terminate traffic in the USA via Avid's network are currently prohibited unless the international company or the company principles are highly reputable, established members of the telecom community.

Compliance with Traceback Investigations

Avid Telecom commits to cooperation and timely response to all traceback, trace forward and investigatory requests from the ITG or any other valid law enforcement or government agency demands. We have resources committed to providing complete responses to such requests in a timely manner. Any customer being reported as participating in a government or corporate impersonation scam is immediately suspended. For all tracebacks, customers are notified of the traceback and are required to respond back to Avid with regard action taken. It is made clear that compliance with the US Telecom traceback process is mandatory. Lack of response results in termination of the customer route. Also, any final action by the customer which Avid does not consider to be adequate (example – simply blocking an ANI is not considered to be adequate) results in suspension of the customer until appropriate action is taken. If there are three or more US Telecom tickets for a customer within a one-week period, the customer is suspended until further review of the issues.

Stir-Shaken Capabilities

As an intermediate voice service provider, Avid's switching platform has been upgraded to comply with Stir/Shaken mandate to accept and accurately transmit all Stir/Shaken data it receives in a call path. We are still evaluating our options with regard to complete

implementation of Stir/Shaken and, of course, will update our plan in regard to any changes related to updated technologies and industry best practices.